

**REMARKS**

In the Office Action<sup>1</sup>, the Examiner objected to the specification; objected to claims 12 and 19; and rejected claims 1-21 under 35 U.S.C. § 102(b) as being anticipated by the Template Software product line ("SNAP").

Applicants have amended the specification and claims 1-6, 8, 10-12, and 19, and canceled claims 7 and 9 without prejudice or disclaimer. Claims 1-6, 8, and 10-21 remain pending.

The Examiner objected to the specification "because it contains an embedded hyperlink and/or other form of browser-executable code" (Office Action at page 2). Applicants have amended paragraph 40 and paragraph 72 of the specification to remove embedded hyperlinks from the specification. Accordingly, Applicants respectfully request withdrawal of the objection to the specification.

Applicants have amended claims 12 and 19 to correct informalities objected to by the Examiner (Office Action at page 2). Accordingly, Applicants respectfully request withdrawal of the objection to claims 12 and 19.

Applicants respectfully traverse the rejection of claims 1-21 under 35 U.S.C. § 102(b) as being anticipated by the *SNAP* and note that the rejection of cancelled claims 7 and 9 is now moot. In order to properly establish that *SNAP* anticipates Applicants' claimed invention under 35 U.S.C. § 102, each and every element of each of the claims in issue must be found, either expressly described or under principles of inherency, in that single reference. Furthermore, "[t]he identical invention must be

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<sup>1</sup> The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

shown in as complete detail as is contained in the . . . claim.” See M.P.E.P. § 2131, quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989).

Claim 1, as amended, recites a method for developing an application, including, for example, “employing an API derived from the data model to access the development objects, wherein employing the API further comprises using tools that use the API to enable a user to . . . refactor a copied one of the development objects to modify a key attribute of the copied one of the development objects.” *SNAP* does not disclose at least these elements of claim 1.

The Examiner alleges that the Workflow Template Training Course for *SNAP* (“*TRAINW*”), Section A, page 3, teaches “enabling a user to refactor a copied development object” (Office Action at page 5). However, this is not correct. *TRAINW* discloses *SNAP* components to “[e]nable[ ] implementation of monitors and controls for multi process applications” (Section A, page 3). *TRAINW* also discloses process templates for “[p]rovid[ing] integrated life-cycle business process modeling tool designed to create enterprise-wide production workflow systems” (Section A, page 3). Finally, *TRAINW* discloses an illustration of a pyramid, where the cross sections in order from the base to the top of the pyramid are labeled as follows:

“Foundation . . . *SNAP* . . . Optional Components,” “Process . . . Templates,” “Business [Templates],” and “Customized Code.” However, *TRAINW* fails to disclose “using tools that use the API to enable a user to . . . refactor a copied one of the development objects to enable to modify a key attribute of the copied one of the development objects while updating existing references,” as recited in claim 1.

Accordingly, for at least the reason stated above, *SNAP* cannot anticipate claim 1. Independent claims 12 and 19, while of different scope, recite elements similar to those of claim 1, and are thus allowable over *SNAP* for at least the same reason as claim 1. Claims 2-6, 8, 10, 11, 13-18, 20 and 21 depend from claims 1, 12, and 19, and are thus allowable over *SNAP* for at for at least the same reasons as claim 1.

In view of the foregoing, Applicants respectfully request reconsideration of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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